

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of)
)
Replacement of Part 90 by Part 88 to)
Revise the Private Land Mobile Radio)
Services and Modify the Policies)
Governing Them) **PR Docket No. 92-235**
)
and)
)
Examination of Exclusivity and)
Frequency Assignment Policies of)
the Private Land Mobile Radio Services)

To: The Commission

REPLY COMMENTS
OF
CHAMPION COMMUNICATION SERVICES, INC.

Introduction

Champion Communication Services, Inc., ("Champion") has followed with interest the regulatory proceedings in the above-referenced private land mobile "refarming" proceeding. Champion has also taken note of the Commission's January 28, 1997 Public Notice soliciting comments on the "technical blueprint" filed by the Industrial Telecommunications Association, Inc. ("ITA"). Champion submits the following reply comments for the Commission's consideration in this proceeding.

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Background

Champion is the licensee of numerous community repeater systems using 450-512 MHz frequencies in the Business Radio Service. Champion sells and leases two-way radio equipment, offers a variety of conventional and trunked radio services, and provides service support to customers in 23 states. Operating almost 1,500 community repeaters, Champion is one of the largest providers of share communications services nationwide. Champion is headquartered in The Woodlands, Texas, and has regional offices in Chicago; Davis, California; Scottsdale, Arizona; and Scotts Bluff, Nebraska.

Reply Comments

Champion applauds ITA for its initiative in attempting to resolve the intricate frequency use issues raised in this proceeding. Taking its cue from ITA's own request for "suggestions for refining the blueprint," Champion submits this document relating to the blueprint. Champion offers these thoughts not from the perspective of improving ITA's blueprint but rather ensuring that the blueprint is implemented in a responsible and orderly manner. Briefly stated, Champion's primary concerns are as follows:

We support the Land Mobile Communications Council (LMCC) position presented to the FCC on November 20, 1995, and referenced by ITA in its Blueprint. The LMCC approach would reward incumbents for investing in more spectrally efficient equipment by giving them a preference for the "new spectrum" that will be created. In particular, in LMCC's plan, primary channel incumbents in the 421-430 MHz, 450-470 MHz and 470-512

MHz bands could claim the adjacent upper 12.5 kilohertz offset channel if they convert to narrow-band technology within six months of the final FCC refarming order. This would not only make an excellent inducement for companies to change out equipment, but it would recognize the current investment of incumbents while facilitating the deployment of narrow-band technologies.

Another way to induce licensees to deploy narrowband equipment is allow them to earn Protected Service Areas (PSA). Champion supports the LMCC's PSA proposal, also referenced in the ITA blueprint, in which licensees could craft an interference-free service area by meeting certain criteria, such as meeting the new spectrum efficiency standards, achieving loading requirements and gathering concurrences from all affected co-channel users. The resulting PSA would be oriented to service-area contours, not geo-political boundaries.

The two-radio pool consolidation proposal put forth in ITA's Blueprint is an important step toward the future. By eliminating arbitrary distinctions between the existing radio services, the FCC would make enormous strides in spectrum efficiency. The creation of two pools -- public safety and private wireless -- would ensure that the available frequencies are distributed among the users in an efficient manner. It also eliminates barriers that have become archaic and useless with the passage of time.

Additionally, Champion supports ITA's proposal to consolidate the radio pools in the

470-512 MHz band. While two pools make sense in the 150-174 MHz and 450-470 MHz bands, it would make more sense to consolidate the pools in the 470-512 MHz band into one pool, because a clear division cannot be made between the public safety and private wireless frequencies in that band. At the current time, eight different service pools reside in the band.

We would like to thank the FCC officials for their due diligence and hard work that has gone into the refarming proceeding over the last five years. The industry is ready move forward in the implementation of narrowband technologies and to more efficiently use the spectrum. With the proper inducements and radio service consolidation, we can work together to make it a success.

Champion Communication Services, Inc.

A handwritten signature in black ink, appearing to read "David A. Terman". The signature is fluid and cursive, with a large initial "D" and "T".

David A. Terman, President
Champion Communication Services, Inc.
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Dated: February 12, 1997